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**From:** Strickland, Chrystal [CStrickland@adem.alabama.gov]  
**Sent:** 7/28/2017 3:53:40 PM  
**To:** Pena-Molina, Ana [pena-molina.ana@epa.gov]  
**CC:** Sharma, Naveen C [NCS@adem.alabama.gov]; Espy, Brian C [BEspy@adem.alabama.gov]; Wilson, J Jason [JWilson@adem.alabama.gov]  
**Subject:** RE: ORCR Summer Interns Project Regarding OB/OD Sites-Alabama

Ana,  
I spoke to the project manager for the Hindman site listed below. This property has had several owners since the early 1900's. The Hindman Wrecker Service purchased the property in the 1990's. This property has been used as a salvage yard and also burned wires/cables to recover metals in what was formerly referred to as the "wire burn area".

Here are the answers to your questions for the Hindman site:

**Clean Closed (CC) Facilities' questions:**

1. Did these sites complete clean closure or are they still in the process of seeking to clean close? This site is clean closed.
2. Did the state officially certify/approve the unit(s) Clean Closed (CC)? Yes
3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation? The years of operation for wire burning appear to be from about 1995-2000. The volume of waste disposed and frequency cannot be determined from the current files.
4. Was it OB or OD or both? OB
5. What sampling procedures were used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring)?
6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)?
7. What clean-up procedures and techniques were used to clean up the contaminants (e.g., excavation, soil sifting)?
8. What data was recorded and metrics used to evaluate the extent and levels of contamination?
9. What criteria was used to certify clean closure (e.g., EPA action levels)?
10. What was the total cost to achieve Clean Closed (CC) status? The total cost of the closure is unknown.

Detailed information does not exist to answer questions 4-9. A memo in the file states that the facility was required to submit a Site Assessment Report for the Wire Burning Area. Based on the results of the report when compared to unrestricted residential soil screening values and review of other soil sampling data, a clean closure determination was made. The excavated soil was considered not to be a hazardous waste.

This concludes the information that could be found for the Hindman site.

*Chrystal*

**From:** Pena-Molina, Ana [mailto:pena-molina.ana@epa.gov]  
**Sent:** Wednesday, July 26, 2017 2:03 PM  
**To:** Strickland, Chrystal <CStrickland@adem.alabama.gov>  
**Cc:** Kuziomko, Joseph <kuziomko.joseph@epa.gov>; Kohler, Amanda <Kohler.Amanda@epa.gov>; Shuster, Kenneth <Shuster.Kenneth@epa.gov>; Housley, Denise <Housley.Denise@epa.gov>; Crosby-Vega, Terri <Crosby-

Vega.Terri@epa.gov>; Newman, Alan <Newman.Alan@epa.gov>; McKeePerez, Nancy <McKeePerez.Nancy@epa.gov>; Danois, Héctor <Danois.Hector@epa.gov>; Gilliland, Houston <Gilliland.Houston@epa.gov>; Watson, Sarah <Watson.Sarah@epa.gov>; Greaney, Kevin <greaney.kevin@epa.gov>; Singh, Harbhajan <Singh.Harbhajan@epa.gov>  
**Subject:** ORCR Summer Interns Project Regarding OB/OD Sites-Alabama

I am writing to seek information on the closure status of the Open Burn/Open Detonation (OB/OD) units listed below to assist ORCR in a new project to assess closure of OB/OD units. With this information, EPA will be able to identify, evaluate, and document procedures, techniques, and criteria to assess, clean up, and close OB/OD units/sites in a standardized manner.

EPA has been documenting soil and ground water contamination from OB/OD units and the costs to clean them up. Given the inordinate extent of contamination and costs of clean-up that have been reported, we are now seeking to learn more about the monitoring, clean-up procedures, successes, and costs of these efforts. There is currently no national guidance on procedures to assess, monitor, and clean up OB/OD sites, nor metrics to achieve clean closure of OB/OD units. We are requesting information on the clean closure (CC) of OB/OD sites to assist us.

Please first verify the following codes for your appropriate facilities in Alabama.

#### Alabama

FACILITY_ID	FACILITY_NAME	UNIT_NAME	UNITs	UNIT_DETAIL_SEQ	legal status	operating status	EFFECTIVE_DATE
AL8213700000	US ARMY GARRISON FT MCCELLAN PELHAM RAN	OB/OD	1	2	IS	CC	20020930
ALR000008649	HINDMAN SALVAGE & RECYCLING	WIRE BURN AREA	1	2	NN	CC	20131022
AL3210020027	ANNISTON ARMY DEPOT	OB2	33	1	IS	IN	19881107
AL3210020027	ANNISTON ARMY DEPOT	OB2	33	1	IS	IN	19881107

#### Questions:

We have a number of questions we hope you can answer regarding your clean closed/closing sites. The operating status of the facilities will determine which sets of questions are to be answered. We understand that some of this data may be difficult to find but we would really appreciate if you could dig it up for us as it will help us move forward with this project and eventually help EPA update OB/OD closing procedures.

#### Clean Closed (CC) Facilities' questions:

1. Did these sites complete clean closure or are they still in the process of seeking to clean close?
2. Did the state officially certify/approve the unit(s) Clean Closed (CC)?
3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation?
4. Was it OB or OD or both?
5. What sampling procedures were used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring)?

6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)?
7. What clean-up procedures and techniques were used to clean up the contaminants (e.g., excavation, soil sifting)?
8. What data was recorded and metrics used to evaluate the extent and levels of contamination?
9. What criteria was used to certify clean closure (e.g., EPA action levels)?
10. What was the total cost to achieve Clean Closed (CC) status?

**Inactive/Closing, but Not Yet RCRA Closed (IN) and Corrective Action and Superfund (CA, SF) Facilities' questions:**

1. Are these units seeking to clean close?
2. If so, what criteria is being used to attempt clean closure (e.g., EPA action levels)?
3. What was the volume of waste disposed, frequency (e.g., daily, weekly, monthly, periodically), and years of operation?
4. Was it OB or OD or both?
5. What sampling procedures are being used to identify the extent of the contamination, including kick-out and fallout (e.g., geophysical techniques used to identify buried munitions and fragments; trenching; grid, spokes, meandering way, visual, or random sampling of soil/for kick-out; depth; until no more found; and ground water monitoring)?
6. Were components of the unit removed (e.g., any platforms, pans, pads, and liners)?
7. What clean-up procedures and techniques are being used to clean up the contaminants (e.g., excavation, soil sifting)?
8. What data is being recorded and metrics being used to evaluate the extent and levels of contamination?
9. What is the total cost to date to remediate the site?

We plan to have a contractor gather this information on a select number of sites from the states. The purpose of this current effort is to gather information on the status of cleanup at these sites to help us identify which sites have the best information for our contractor to follow up with. Thus, for this effort, we seek answers to questions 1-4 and the last question in each set, and for the remaining questions we seek whether or not good information exists to answer these questions. We hope to receive this information by **July 31<sup>st</sup>**. Thank you for taking time to assist us with this project. If you have any questions please feel free to reach out to us. Any information that you may be able to provide will be helpful in our project. Sincerely,

Ana Pena-Molina  
703-308-8753

U.S. EPA Headquarters  
Two Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-3553